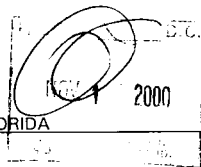


United States District Court



SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

SALOMON RAMIREZ,  
a/k/a "Alexis Manuel Medero-Melendez,"

CASE NUMBER: 00-4264-SNOW

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 30, 1999 in Broward County, in the Southern District of Florida and elsewhere, defendant, (Track Statutory Language of Offense)

SALOMON RAMIREZ, did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated that he was a United States citizen and that his name was Alexis Manuel Madero, which statements he knew to be false

in violation of Title 18 United States Code, Sections 1542.

I further state that I am a Special Agent, U.S. Dept. of State and that this complaint is based on the following facts:  
Official Title

Please see attached affidavit.

Continued on the attached and made a part hereof: ☒ Yes ☐ No

Signature of Complainant  
Jorge Espinoza  
Special Agent  
United States Department of State  
Diplomatic Security Service

Sworn to before me, and subscribed in my presence,  
the Court finds probable cause.

November 16, 2000  
Date

at Fort Lauderdale, Florida  
City and State

LURANA S. SNOW, UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

Signature of Judicial Officer

**AFFIDAVIT**

*I, Jorge A. Espinoza, being duly sworn, hereby depose and say that:*

1. I am a Special Agent with the United States Department of State, Bureau of Diplomatic Security and have so been employed since November 1, 1999. Prior to that I was employed in the private sector as an information technology professional for over eight years. My current responsibilities include the investigation of passport and visa fraud violations.

2. The facts set forth below are based upon my personal observations as well as from information and documents provided to me by other law enforcement personnel and private citizens and was corroborated by your Affiant during the course of this investigation. This affidavit is provided for the limited purpose of showing probable cause, therefore your Affiant has not provided details of every aspect of the investigation.

3. On December 30, 1999, an individual purporting to be Alexis Manuel Medero applied for an U.S. Passport at the Board of County Commissioners in Broward County Florida by completing a DSP -11 application for passport form. In the application he listed his name as Alexis Manuel Medero and claimed to be a United States citizen. He listed his date of birth as March 20, 1959. As proof of citizenship he provided a birth certificate, (# 152-59-00387-000000-001203), issued by the Puerto Rico Department of Health in the name of Alexis Manuel Medero Melendez. For identification the individual submitted a Florida Identification Card in the name of Alexis Manuel Medero (M360-013-59-100-0), and a Social Security Card, (# 583-86-7477). The applicant then filed the DSP-11 and took an oath swearing or affirming that the information contained in the application was true, and signed the application.

4. The passport application was referred to the fraud program manager, Ms. Maria Paz, due to the presence of various fraud indicators and was referred to the Diplomatic Security Service for further investigation.

5. According to the passport application, the applicant listed his permanent address as 3469 NW 44<sup>th</sup> Street, #105 in Fort Lauderdale, Florida. Further investigation by your Affiant revealed that the passport applicant never lived at the listed address, but rather was living at 807 NW 24<sup>th</sup> Street, Apartment 5 in Wilton Manors, Florida. The personal photograph provided by the applicant was shown to individuals familiar with the individual featured in the photograph who identified the individual purporting to be "Alexis Manuel Medero" as SALOMON RAMIREZ.

6. INS records reveal that SALOMON RAMIREZ was a citizen of Colombia. Said INS records indicated that RAMIREZ was issued a tourist visa on March 18, 1993 and said visa expired on March 13, 1998. According to the records, RAMIREZ entered the United States on April 13, 1993 and applied for political asylum in May of 1993. RAMIREZ never showed up for an appointment with INS concerning the asylum application and was never heard of by INS again. RAMIREZ'S current alien status in the United States is "illegal."

7. INS Special Agent, Waleska M. Zavala compared a copy of the RAMIREZ'S Colombian passport and Florida DHSMV photograph in the same name to the photograph submitted with the DSP-11 (Attachment "A"), passport application, and the individual featured in all of the photographs appears to be one in the same individual.

8. A criminal records check of Alexis Manuel Medero Melendez, DOB March 20, 1959, indicated that he was arrested in San Juan, Puerto Rico on May 14, 1997. The arrest

photograph shows that Alexis Manuel Medero does not appear to be the same individual who submitted DSP-11 passport application on December 30, 1999. (See Attachment "B").

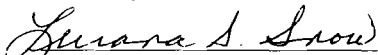
9. Based upon the forgoing, I submit that there is probable cause to believe that SALOMON RAMIREZ made false statements in an application for a United States Passport, in violation of Title 18, United States Code, Sections 1542.

FURTHER YOUR AFFIANT SAYEYTH NOT.



Jorge A. Espinoza  
Special Agent  
U.S. Department of State  
Bureau of Diplomatic Security

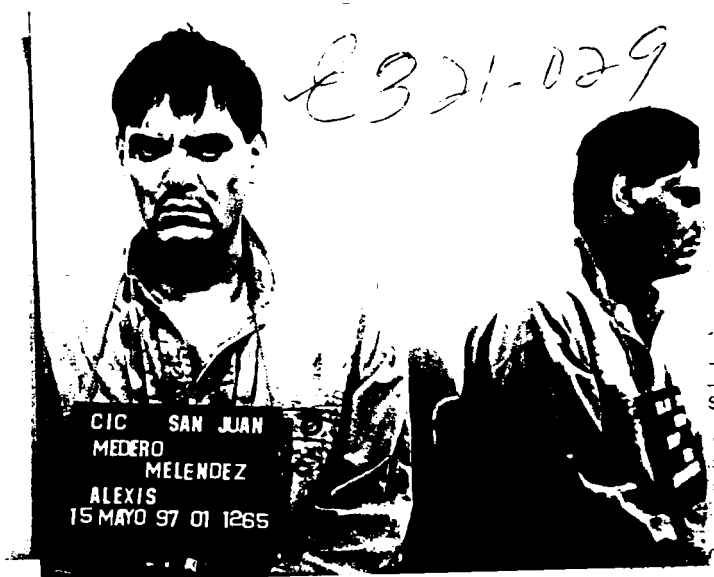
Sworn to and subscribed before me  
this 16<sup>th</sup> day of November, 2000.



LURANA S. SNOW  
UNITED STATES MAGISTRATE JUDGE



Attachment "A"



Attachment "B"